

Re: The Barry White Family Trust v. Cooley et al.,

Case No. 24-cv-07509 (DLC)

I, Joe Cooley, hereby declare as follows:

1. I am a named defendant in the above case
2. I respectfully notify the Court that I do not oppose the withdrawal of my former attorneys, Fox Rothschild LLP.
3. I wish to proceed pro se and represent myself in this matter as a defendant.
4. My contribution to the song “Everlasting Bass” was strictly and solely as a performer, limited to providing scratching elements during the recording process. I had no involvement whatsoever in the composition, lyrics, or instrumental production, nor did I participate in the sound recording’s creation beyond my performance role.
5. I make no claims to ownership and rights to “Everlasting Bass” and have never handled any business or licensing matters regarding the song.
6. To my knowledge and understanding, all rights, control, and business decisions regarding “Everlasting Bass” are done by Rodney Oliver (Rodney-O), who has always held ownership and authority over the work.
7. I respectfully request that the Court take this information into consideration in evaluating my role and potential liability in this case.

I declare under penalty of perjury that the foregoing is true and correct.

March 30, 2025

/s/ Joe Cooley Pro Se

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